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January 31, 2022

Via ECF Filing

The Honorable Ramon E. Reyes, Jr.
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**RE: *Kaikov v. Kaikov, et. al.*, Case No. 19-cv-2521- LDH-RER
Motion to Extend Expert Discovery Deadline**

Dear Judge Reyes:

I am counsel for Plaintiff in the above-referenced matter. I am writing to respectfully request the Court to extend expert discovery deadlines by 45 days for the reasons set forth below.

This is a second request for extension of expert discovery deadlines. There are no set deadlines other than a scheduled status conference on February 16, 2022 and pre-trial conference in this matter set for April 20, 2022.

On January 18, 2022, the Court granted Plaintiff's motion to compel discovery from Defendants' accountant ordering accountant to produce documents by February 4, 2022 and appear for a deposition. The Order was served on the accountant on January 21, 2022 (certificate of service will be filed shortly). Plaintiff expects to receive financial documents (e.g. profit and loss statements, tax returns) and testimony from accountant that are essential for calculation of Plaintiff's damages related to the Investment Properties. Plaintiff's expert report is currently due on January 31, 2021. Plaintiff requires the documents to have full damages calculations for the report and request that the Court extends the current deadline by 45 days. Defendants take no position regarding this request.

Accordingly, Plaintiff requests that the expert discovery deadlines be extended as follows:

Plaintiff's expert report	March 15, 2022
Defendants' Counter	May 15, 2022
Expert Depositions	July 1, 2022.

We thank the Court for its time and effort in consideration of this matter.

THE HONORABLE RAMON E. REYES, JR.

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Respectfully submitted,

/s/ Maria Temkin

Maria Temkin, Esq.

For: TEMKIN & ASSOCIATES, LLC

MT

Cc: All counsel of record (via ECF System)

